

REMARKS

Claims 1-38 are presented for consideration, with Claims 1, 24, 29, 30, 32, 34, 36 and 38 being independent.

The independent claims have been amended to further distinguish Applicant's invention from the cited art. Support for the claim amendments can be found, for example, on page 3, line 26, *et. seq.*, of the specification.

Initially, Applicant wishes to thank the Examiner for the courtesy extended toward their representative during the personal interview of May 9, 2006. The interview focused on the issues raised in the Office Action of January 11, 2006, and primarily the rejection of Claims 1-37 under 35 U.S.C. §103. In discussing this rejection, proposed amendments to Claim 1 were discussed to further distinguish Applicant's invention over Aono '633 and the Turk publication.

The proposed amendments included amending paragraph (d) of Claim 1 to recite that the adjacent shape elements overlap "with each other" to fill the predetermined region of images. Additionally, proposed amendments to paragraph (e) of Claim 1 set forth that an interference of the opacities of the overlapping elements generates a colored or shaded texture.

The Examiner tentatively agreed that amending Claim 1 in this manner would distinguish it from the proposed combination of Aono and Turk. It was also indicated that such an amendment would raise new issues that would require further consideration and an updated search for prior art.

It was also agreed that the previous rejection of Claim 21 under 35 U.S.C. §112, second paragraph, as set forth in the previous Office Action of July 28, 2005, has been withdrawn.

In the Office Action, Claims 1-37 stand rejected under 35 U.S.C. §103 as allegedly being obvious over Aono in combination with Turk.

As discussed at the interview, Aono relates to a geometric processor that uses Gouraud shading for linearly interpolating a color shade across a polygon. As acknowledged in the Office Action, as well as the interview, Aono does not provide placing a shape element at identified points such that adjacent shape elements overlap with each other. It follows, then, that Aono also does not render shape elements such that an interference of the opacities of the overlapping elements generates a colored or shaded texture. Additionally, Aono is not understood to teach or suggest providing shape elements with an opacity which varies over its surface.

The secondary citation to Turk relates to texture mapping and was cited to compensate for the deficiencies in Aono. Turk relies on a reaction diffusion system that is simulated on a two dimensional field, or grid, of cells. In Turk, however, the reaction diffusion system on the grid provides for a cell to overlap an area on the grid. It was agreed at the personal interview, however, that Turk does not teach or suggest that adjacent shape elements overlap with each other.

Accordingly, without conceding the propriety of combining Aono and Turk in the manner proposed in the Office Action, such a combination still fails to teach or suggest

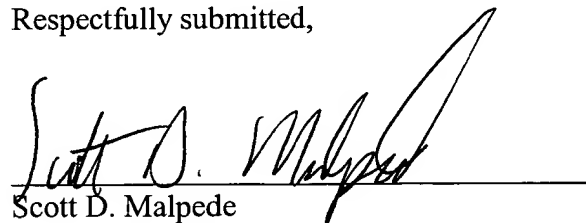
Claim 1 of Applicant's invention. As will be appreciated, each of the independent claims has been amended in the same manner as Claim 1. Therefore, reconsideration and withdrawal of the rejection under 35 U.S.C. §103 is respectfully requested.

Accordingly, it is submitted that Applicant's invention as set forth in independent Claims 1, 24, 29, 30, 32, 34, 36 and 38 is patentable over the cited art. In addition, dependent Claims 2-23, 25-28, 31, 33, 35 and 37 set forth additional features of Applicant's invention. Independent consideration of the dependent claims is respectfully requested.

Due consideration and prompt passage to issue are respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Scott D. Malpede", is written over a horizontal line.

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